

August 3, 2018

Mr. David A. Crass  
Michael Best  
One South Pinckney Street  
Suite 700  
Madison, WI 53703

Re: Armenia Growers Coalition

Dear Mr. Crass:

The Wisconsin Department of Natural Resources (WDNR) and the United States Environmental Protection Agency (EPA) appreciate the proposal put forth by the Armenia Growers Coalition (AGC) during our July 30, 2018 meeting in Madison, Wisconsin and the actions AGC has already taken to act on the proposal. As promised at the meeting, the agencies are providing feedback on certain matters proposed by AGC.

1. Alternative Water Supplies for Well Owners with Groundwater Exceeding 10 mg/l Nitrate Contamination

AGC indicated at the meeting that it is willing to provide bottled water as soon as contact can be made with the impacted well owners. Based on sampling conducted by EPA and the counties, we know of homes in the Study Area<sup>1</sup> that currently have well water with nitrate contamination greater than 10.0 mg/l. We understand that AGC has taken steps to notify these homeowners and stands ready to provide bottled water for all of the affected homeowners as soon as possible. The agencies expect that AGC will provide bottled water to residences via direct delivery or by other means acceptable to the homeowner.

2. Long-Term Treatment Systems for Well Owners with Groundwater Exceeding 10 mg/l Nitrate Contamination

AGC indicated at the meeting and in its recent communications to the homeowners that it will offer to install point-of-use treatment systems at the known impacted homes. We understand that AGC will also include a replacement filter for each homeowner to install. At the time of our meeting, AGC was still in the process of determining which type of treatment system it intended to propose (reverse osmosis, ion exchange, etc.).

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<sup>1</sup> *The Study Area includes those portions of Juneau and Wood County west of Lake Petenwell and included in EPA and the counties' latest sampling efforts. The Study Area may include other areas adjacent to or downgradient of fields associated with AGC operations*

The agencies support the Coalition's offer to install point-of-use treatment systems. To meet federal drinking water standards, those systems must be able to successfully treat the contaminated groundwater to 10.0 mg/l nitrate or below. The agencies understand that AGC has offered to install such systems at each of the impacted residences. Before AGC decides on a preferred system, the agencies would like the opportunity to review and comment on the proposed systems to ensure that the technology is consistent with state requirements and likely sufficient to treat the levels of contamination known to exist at the residences.

The agencies are concerned about the ability of homeowners to perform the necessary long-term maintenance of the point-of-use treatment systems. The agencies believe that long-term maintenance of the treatment systems should be provided until nitrate levels in the untreated water are consistently below 10 mg/l, and we would like to further discuss the long-term maintenance of the systems with AGC.

We would also like to discuss AGC's commitment should an installed treatment system not effectively reduce nitrate concentrations to or below 10.0 mg/l. The agencies would expect AGC to provide bottled water as needed until a more effective solution is implemented.

### 3. Long-Term Monitoring and Additional Sampling

We discussed long-term monitoring during the July 30 meeting, although AGC did not make a specific proposal concerning monitoring. The agencies believe a monitoring plan for all residences in the Study Area is needed and we are willing to discuss options for such monitoring, including potential roles for the agencies, counties, AGC, and perhaps others. The plan should include confirmatory and routine sampling for treatment system effectiveness, and routine monitoring of all the private wells within the Study Area.

As part of this effort, the agencies request that AGC take steps to sample the wells of those homes within the Study Area that have not already been sampled. If there are other wells with nitrate contamination greater than 10.0 mg/l, these homeowners should also be offered bottled water and long-term point of use treatment systems.

### 4. EPA Involvement

As discussed during our meeting, EPA needs to be kept up to date on the progress of the proposed activities outlined above. DNR has offered to be the point of contact for AGC to keep EPA informed.

### 5. Reporting

The agencies understand that interest in the water quality in the Central Sands region will remain after the immediate needs of impacted residents are addressed. Therefore, we believe that further discussion is needed on how information can be provided to the agencies and interested members of the public.

6. Memorandum of Understanding

During the meeting, AGC suggested that a Memorandum of Understanding (MOU) among AGC, the counties, and perhaps the State was under consideration. Although EPA would not be a signatory to the MOU, the agencies believe that there should be a binding agreement to implement the necessary actions. We welcome the opportunity to work with you to prepare an MOU, or other enforceable document, to spell out roles and responsibilities, commitments, procedures, schedules, deliverables, and contingencies.

7. Long-Term Source Control


Control of nitrate sources was discussed during the July 30 meeting and there was general agreement that the issue is critical to addressing the long-term nitrate problem in the Central Sands area. The agencies propose a dialogue for discussing agricultural practices that would reduce nitrate levels in groundwater in the Central Sands area. The agencies understand that this effort may involve many parties, including the agencies, counties, AGC, academia, and others.

Conclusion

We commend AGC for its proposal and its recent actions to provide water to affected homeowners. The agencies want to continue the dialog that has been taking place and we are willing to meet or have a conference call with AGC and the counties as soon as possible to continue to advance these matters in a manner that is protective of human health. Please contact WDNR Deputy Division Administrator Jim Zellmer at (608) 267-7651 and EPA Region 5 Acting Water Division Director Linda Holst at (312) 886-6758.

Sincerely,

Jim Zellmer  
WDNR Deputy Division Administrator



Linda Holst  
EPA Region 5 Acting Water Division Director